

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EURO-PRO Operating LLC,)
d/b/a EURO-PRO Corporation,)
Plaintiff,)
v.) CASE NO. 08-CV-6231 (HB)
EUROFLEX AMERICAS)
EUROFLEX SRL, ITALY) ECF CASE
ANDREA MILANESE)
PIER ANTONIO MILANESE,) MOTION TO ADMIT COUNSEL
Defendants.) PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael C. Hartmere, a member in good standing of the bar of this Court, hereby move the Court for an Order allowing the admission pro hac vice of:

Mary Ellen R. Himes
VENABLE LLP
575 7th Street, NW
Washington, DC 20004-1601
Phone: (202) 344-4356
Fax: (202) 344-8300
mehimes@venable.com

Mary Ellen R. Himes is a member in good standing of the Bars of the State of Maryland and the District of Columbia. There are no pending disciplinary proceedings against Mary Ellen R. Himes in any State or Federal Court.

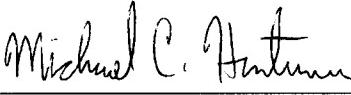
MCH 6/25/2008

MCH 6/25/2008

Dated: August 29, 2008
New York, New York

Respectfully submitted,

By:


Michael C. Hartmere (MH-6839)
VENABLE LLP
1270 Avenue of the Americas
25th Floor
New York, New York 10020
Telephone: (212) 307-5500
Fax: (212) 307-5598
mchartmere@venable.com

*Attorneys for Plaintiff
EURO-PRO Operating LLC,
d/b/a EURO-PRO Corporation*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|------------------------------------|---|----------------------------------|
| EURO-PRO Operating LLC, |) | |
| d/b/a EURO-PRO Corporation, |) | CASE NO. 08-CV-6231 (HB) |
| |) | |
| Plaintiff, |) | ECF CASE |
| |) | |
| v. |) | |
| |) | |
| EUROFLEX AMERICAS |) | DECLARATION OF MICHAEL C. |
| EUROFLEX SRL, ITALY |) | HARTMERE IN SUPPORT OF |
| ANDREA MILANESE |) | MOTION TO ADMIT COUNSEL |
| PIER ANTONIO MILANESE, |) | <u>PRO HAC VICE</u> |
| |) | |
| Defendants. |) | |
| <hr/> | | |

| | | |
|---------------------------|---|-----|
| State of New York |) | |
| |) | ss: |
| County of New York |) | |

MICHAEL C. HARTMERE hereby deposes and says as follows:

1. I am an associate in the firm Venable LLP, counsel for Plaintiff EURO-PRO Operating LLC, d/b/a EURO-PRO Corporation ("EURO-PRO") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of EURO-PRO's motion to admit Mary Ellen R. Himes as counsel pro hac vice to represent EURO-PRO in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2002. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mary Ellen R. Himes since 2008.

4. Mary Ellen R. Himes is associated with Venable LLP, in Washington, DC. Her office is located at 575 7th Street, NW, Washington, DC 20004-1601.
5. Certificates of good standing for Mary Ellen R. Himes in the State of Maryland and the District of Columbia are attached hereto as **Exhibit A**.
6. I have found Mary Ellen R. Himes to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
7. Accordingly, I am pleased to move for the admission of Mary Ellen R. Himes, pro hac vice.
8. I respectfully submit a proposed order granting the admission of Mary Ellen R. Himes, pro hac vice, which is attached hereto as **Exhibit B**.

WHEREFORE it is respectfully requested that the motion to admit Mary Ellen R. Himes, pro hac vice, to represent Plaintiff EURO-PRO in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29 day of August, 2008.

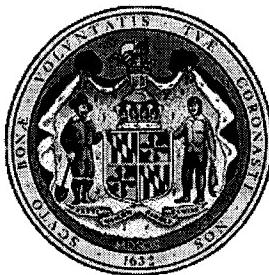


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*Attorneys for Plaintiff
EURO-PRO Operating LLC,
d/b/a EURO-PRO Corporation*

EXHIBIT A

Court of Appeals
of Maryland
Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the eleventh day of December, 2001,*

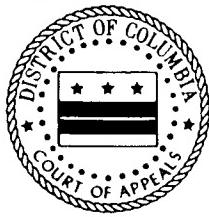
Mary Ellen Roy Himes

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
seventh day of August, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

MARY R. HIMES

was on the 12TH day of NOVEMBER, 2004

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 7, 2008.

GARLAND PINKSTON, JR., CLERK

By: N. Charles
Deputy Clerk

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|------------------------------------|---|---------------------------------|
| EURO-PRO Operating LLC, |) | |
| d/b/a EURO-PRO Corporation, |) | CASE NO. 08-CV-6231 (HB) |
| |) | |
| Plaintiff, |) | ECF CASE |
| |) | |
| v. |) | |
| |) | |
| EUROFLEX AMERICAS |) | ORDER FOR ADMISSION |
| EUROFLEX SRL, ITALY |) | PRO HAC VICE |
| ANDREA MILANESE |) | <u>ON WRITTEN MOTION</u> |
| PIER ANTONIO MILANESE, |) | |
| |) | |
| Defendants. |) | |
| |) | |

Upon the motion of Michael C. Hartmere, attorney for Plaintiff EURO-PRO Operating LLC, d/b/a EURO-PRO Corporation and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that:

Mary Ellen R. Himes
 VENABLE LLP
 575 7th Street, NW
 Washington, DC 20004-1601
 Phone: (202) 344-4356
 Fax: (202) 344-8300
mehimes@venable.com

is admitted to practice pro hac vice as counsel for Plaintiff EURO-PRO Operating LLC, d/b/a EURO-PRO Corporation in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: August ___, 2008
New York, New York

U.S.D.J./U.S.M.J.

CERTIFICATE OF SERVICE

I, Michael C. Hartmere, hereby certify that on August 29, 2008, I caused a true and correct copy of the foregoing **Motion to Admit Counsel Pro Hac Vice**, to be served via email and U.S. Mail, postage pre-paid, on counsel of record at the following addresses:

Gregory A. Clarick
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New York, New York 10036
Telephone: (212) 790-4500
Fax: (212) 790-4545
gclarick@manatt.com

Attorneys for Defendants



Michael C. Hartmere